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Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Received & Inspected

MAR 05 2008

FCC Mail Room

RE: CPNI Certification and Supporting Documents

To Whom It May Concern:

Please find enclosed the CPNI Certification and supporting documents for Gazelle Link, LLC, an Iowa Corporation,. Thanks in advance for your attention to this matter. If you have any questions, concerning this document, please do not hesitate to contact our corporation.

Very truly yours,

Aaron J. McLeod, Esq.
General Counsel

Enclosure

No. of Copies rec'd 043
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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Received & Inspected

Annual 64.2009(e) CPNI Certification for 2008

MAR 05 2008

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Date filed: February 29, 2008

Name of Company Covered by this Certification: Gazelle Link, LLC

Form 499 Filer ID: 826154

Name of Signatory: Aaron J. McLeod, Esq.

Title of Signatory: General Counsel

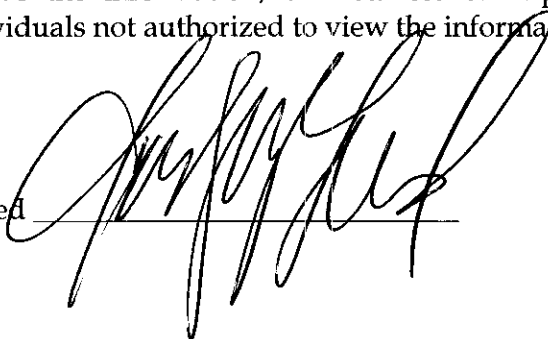
I, Aaron J. McLeod, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company [is/ is not] in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. See attached GZ Link Privacy Policy.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed



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Privacy Policy

Gazelle Link is committed to protecting your privacy. Please read this privacy policy statement carefully so that you understand what kind of information we may gather about you, how we may use that information, whether we may disclose it to anyone, and the choices you have regarding our use of the information and your ability to correct the information. We will not trade, sell, or disclose to any third party any form of personally identifiable information without your consent, including information derived from registration, subscription, and use of the Gazelle Link service, except as stated below. This policy applies only to Gazelle Link, and not to other companies' or organizations' Web sites to which we link.

The Information We Collect

The information Gazelle Link gathers generally falls into three categories: (1) personal, business, and demographic information you supply that we use primarily for evaluating applicants and conducting market research; (2) information you supply when you register or initiate transactions; and (3) tracking information gathered as you navigate online. Some of this information identifies a particular person, but much of it does not. Third-party providers, whose sites are featured on and accessed via our site, may gather information as well.

When you interact with Gazelle Link, when applying for Service, for example, we may request some or all of the following information:

- Contact information (e.g., name, address, telephone number, and e-mail address)
- Credit card, debit card or check card and Gazelle Link account number
- Driver's license
- Company name (for corporate accounts)
- Household characteristics (e.g., number of children and number of Internet users)
- Technology employed (e.g., type of Internet access and specifications for your computer)

Why We Collect This Information

We need this information to process your application or service order and to conduct market research. If we have trouble processing your application or order, we use the contact information you provide to get in touch with you. We also use your contact information to provide you with Gazelle Link updates or to assist you with your

wireless broadband service and to inform you of new products or services that may be of interest to you.

Use of Cookies

To help make our website more responsive to your needs, we use a standard feature of browser software nicknamed "cookies." We use cookies to help us tailor our website to your needs, to deliver a better, more personalized service, and to remember certain choices you've made so you don't have to re-enter them. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. For example, if you personalize Gazelle Link pages, or register with Gazelle Link sites or services, a cookie helps Gazelle Link recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, preferred email address, and so on. When you return to Gazelle Link, the information you previously provided can be retrieved, so you can easily use the Gazelle Link features that you customized.

We use two kinds of cookies: (i) temporary or "session"-based cookies that contain certain information about a user's or visitor's use of our website at a particular time and (ii) "persistent" cookies that contain certain account-related information about a registered user's use of our website. Session-based cookies are automatically disabled or deleted when a user or visitor to our website closes his or her browser software at the end of session. Persistent cookies remain stored on a registered user's computer system until he or she disables or deletes them. Of course, if you set your browser not to accept cookies or you delete them, you may not be able to take advantage of the personalized features enjoyed by other visitors to and users of our website.

Information Collected by Third Parties

Of course, our site includes links to other web sites, and provides access to products and services offered by third parties, whose privacy policies we don't control. When you access another web site or purchase products or services or conduct other transactions through a Web site linked to our web site, use of any information you provide is governed by the privacy policy of the operator of the site you're visiting or the provider of such products or services. The provider's privacy practices may differ from ours. Please be aware that these third-party sites may also use their own cookies, web beacons or third-party software or "spyware", for which we are not responsible.

Disclosure of Information

We consider the personal information contained in our business records to be confidential. Gazelle Link will not read, listen to or disclose to any third parties private e-mail, conversations, or other communications, except as described here, that are transmitted using our services. We may sometimes disclose information about you to our business partners or to others who work for us. We may access and/or disclose your personal information if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on Gazelle Link; (b) protect and defend the rights or property of Gazelle Link including, without limitation the security and integrity of our network; or (c) act under exigent circumstances to protect the personal safety of users of our services or members of the public.

As our business grows, we may buy or sell various assets. In the unlikely event that Gazelle Link, one of its business units, or substantially all of its assets are acquired by another company, information about our visitors would be among the transferred assets.

CUSTOMER PROPRIETARY NETWORK INFORMATION (INTERNET PHONE SERVICE ONLY)

Gazelle Link is also subject to specific federal privacy rules related to the use, disclosure or access to a particular form of personal information derived specifically from the provision of Internet Phone Service. This information is called customer proprietary network information or "CPNI." While your name, address and phone number are not considered CPNI, CPNI includes, but is not limited to, call detail information such as the numbers you call; the date and time of calls, call location information, billing detail, or any other information relating specifically to the quantity, technical configuration, type, destination, and amount of use of your Internet Phone Service.

Under Federal Communications Commissions or "FCC" rules which become effective December 8, 2007, you have a right, and Gazelle Link has a duty, to ensure the confidentiality of CPNI. Gazelle Link may use, disclose or permit access to your CPNI only as permitted by law.

For example, Gazelle Link may itself use, or may disclose or permit access to your CPNI, in conjunction with our provision of Internet Phone service to you. We may also use, disclose or permit access to CPNI: to offer to you additional Internet Phone service offerings and related features, including, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., and call forwarding; to provide any

related equipment, maintenance, and repair services; to protect the rights or property of Gazelle Link; or, to protect users of Gazelle Link's services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, Gazelle Link's services.

Other uses of your CPNI, for example, using, or sharing your CPNI with agents, affiliates, joint venture partners or independent contractors, for purposes of marketing you non-Internet Phone Service communications-related services for which you may be interested or eligible, are permitted only with your approval.

Federal law requires us to provide all Internet Phone Service customers with specific CPNI notifications advising you of your rights concerning your consent to use, disclosure, and permit access to your CPNI for various marketing purposes.

Opt-Out Consent Policy

Gazelle Link is committed to protecting the privacy of all of your personally identifiable information, including your CPNI. Consistent with that commitment, from time to time, Gazelle Link may use your CPNI, or disclose or permit access to your CPNI to its agents or affiliates, solely for the purpose of better enabling Gazelle Link, or its agents or affiliates, to offer you new or different services or products (other than services or features related to Internet Voice) that are specifically tailored to your particular needs or circumstances. Using your CPNI for such purposes enhances the ability to make such additional services or products available to you. If you do not desire that your CPNI be used for such purposes, however, you have the right to deny us access for such use or disclosure. Gazelle Link may assume your approval to use your CPNI for the purposes described above, if you do not elect to opt-out through one of the methods indicated in your Opt-out Notification within 30 days of receipt. If you do not choose to opt-out initially, you are entitled to disapprove, deny or withdraw access to your CPNI at any future time by contacting Customer Care at 1-319-365-2600. If you do choose to opt-out at any time, it will not affect the provision of any Gazelle Link services to which you currently subscribe. Gazelle Link will provide you follow-up opt-out notifications every two years as required by law to ensure that you remain fully aware of your CPNI rights set forth above.

Opt-in Consent Policy

In addition to the use or disclosure of your CPNI set forth above, Gazelle Link's business partners, including independent contractors and joint venture partners, may seek to use your CPNI to market you additional new or different communications-related services or products that are not related to Internet Phone Service. Gazelle Link must obtain your express consent, however, before Gazelle Link can disclose or permit access to your CPNI to its business partners for this purpose. If you consent to Gazelle

Link disclosing or permitting access to your CPNI for the purposes described above, you must indicate your consent by one of the methods set forth in your Opt-In Notification. You are entitled to change your CPNI opt-in consent at any time to disapprove, deny or withdraw your consent to disclosing or permitting access to your CPNI, by calling Customer Care at 1-319-365-2600 and indicating your intent to change your preference.

Internal CPNI Procedures

Pursuant to federal requirements, Gazelle Link has developed and implemented an internal software system to flag and track access to Internet Phone service customer records that contain CPNI, and has instituted employee training programs to educate customer service and other employees who may have access to CPNI regarding how and when they may use CPNI. Gazelle Link maintains an electronic audit mechanism to track all access to customer account information. Federal law prohibits Gazelle Link from releasing call detail information and/or records in any manner other than emailing it to your Gazelle Link email account of record for at least 30 days; calling you on your Gazelle Link Internet Phone service number that has been active with us for at least 30 days; allowing you to access this information using a password protected online account; or allowing you to access this information at a Gazelle Link retail location with a valid government-issued photo ID. Gazelle Link will also notify you of any attempted changes to your account information, for example, attempts to change your password or email address to ensure such changes are being sought and authorized only by you.

Security

Gazelle Link is committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use or disclosure. For example, we store the personal information you provide on computer systems with limited access, which are located in controlled facilities. When we transmit highly confidential information (such as a credit card number) over the Internet, we protect it through the use of encryption, such as the Secure Socket Layer (SSL) protocol. As effective as modern security practices are, no physical or electronic security system is impenetrable. We cannot guarantee the complete security of our database, nor can we guarantee that information you supply won't be intercepted while being transmitted to us over the Internet. We have implemented strict internal guidelines to ensure that your privacy is safeguarded at every level of our organization. Gazelle Link will continue to revise policies and implement additional security features as new technologies become available.

Gazelle Link and Kids

Gazelle Link takes care to protect the safety and privacy of young people using our services, and encourages you to participate in your child's experience in cyberspace. We do not sell products or services to kids. Also, we do not knowingly collect personally identifiable information from children and teenagers under the age of 18 and Gazelle Link does not wish to collect any such information.

Parents, please note that if you grant consent for your child to use our services, your child will be able to communicate with other users of all ages. Before providing consent, please be aware that your child will be able to disclose personal information (e.g. name, address, e-mail, phone numbers) on his or her own. We encourage you to talk with your children about communicating with strangers and disclosing personal information online. You can obtain additional information about safe surfing through the Federal Trade Commission web site.

<http://www.ftc.gov/bcp/online/pubs/online/sitesee.shtm>

Federal law requires website operators who collect personal information from children under the age of thirteen to first get parental consent. Gazelle Link will not knowingly link to any third party web site that solicits or collects personally identifiable information from minors.

Gazelle Link Spam Policy

Spam is email that is sent against the wishes of the recipient. There are two kinds. The first kind of spam concerns individuals who email people that they don't know personally. The second type of spam is sent by organizations to individuals who have not expressed a desire to receive such communications. Both kinds of spam are inappropriate.

Gazelle Link will deal with Spam complaints seriously and will close spammer's customer accounts. We may use customer information to investigate and prevent potentially unlawful activity that threatens the service or network integrity or otherwise violates the service agreement.

Enforcement of this Privacy Statement

If you have questions regarding this statement, you should contact Gazelle Link.

European Union Data Considerations

Personal information collected on this site may be stored and processed in the United States or any other country in which Gazelle Link or its affiliates, subsidiaries or agents maintain facilities, and by using this site, you consent to any such transfer of information outside of your country. Gazelle Link abides by the safe harbor framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of data from the European Union.

Privacy Policy Changes

If we decide to change our privacy policy, we will post those changes here so that you will always know what information we gather, how we might use that information and whether we will disclose it to anyone. By continuing to use Gazelle Link after we post any changes, you accept and agree to this privacy statement, as modified. Of course, our use of information gathered while the current privacy statement is in effect will be consistent with the current statement, even if we change that statement later.